## THE TEDESCHI LAW FIRM, P.A. 1422 LAUREL STREET COLUMBIA, SOUTH CAROLINA 29201

DEBRA SHERMAN TEDESCHI\*

\*Also admitted in PA

February 3, 2011

#### **VIA E-FILING**

The Honorable Jocelyn Boyd Chief Clerk/Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, SC 29210

RE: CMC Steel - South Carolina

Petition of South Carolina Electric & Gas Company for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina – Docket No. 2010-376-E

Dear Ms. Boyd:

Enclosed for filing please find the *Motion of CMC Steel South Carolina For Admission Pro Hac Vice* in the above-referenced matter. By copy of this letter, I am serving all parties of record. If you have any questions relating to the enclosed please do not hesitate to contact me.

Thank you for your assistance with this matter.

Sincerely yours,

Debra S. Tedeschi

Massely.

**Enclosures** 

cc: Damon E. Xenopoulos, Esq.

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Petition of South Carolina Electric & Gas	)	
Company for Updates and Revisions to	)	
Schedules Related to the Construction of a	)	Docket No. 2010-376-E
Nuclear Base Load Generation Facility at	)	
Jenkinsville, South Carolina	)	

#### MOTION FOR ADMISSION PRO HAC VICE

CMC Steel South Carolina ("CMC") respectfully moves the Public Service Commission of South Carolina ("Commission") to permit Damon E. Xenopoulos to practice Pro Hac Vice before the Commission in the above-referenced matter. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Xenopoulos, together with the undersigned counsel of record, have filed an Application for Admission Pro Hac Vice with the South Carolina Supreme Court. A file stamped copy of that application along with a certificate of service indicating that the application has been filed with the Supreme Court is attached as Exhibit 1.

Respectfully submitted this \_\_\_\_\_ day of February, 2011.

Debra Sherman Tedeschi

THE TEDESCHI LAW FIRM, P.A.

1422 Laurel Street

Columbia, SC 29201

(803) 540-3090

Attorneys for CMC Steel South Carolina

#### **EXHIBIT 1**

## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Petition of South Carolina Electric & Gas Company for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation Facility at Jenkinsville, South Carolina	) ) ) )	Docket No. 201	0-376-E
VERIFIED APPLICA PRO H			ON T
Comes now Damon Xenopoulos, applicant following:	herein,	and respectfully r	epresents the
1. Applicant resides at 5028 Warren Street, NW			FEB 0 3 2011
Street Address Washington , DC		, 20016 ,	S.C. SUPREME COURT
City County State Zip Code 202-271-1624 Telephone			some control of the c
2. Applicant is an attorney and a member of name of)	the law	firm of (or pract	ices law under the
Brickfield, Burchette, Ritts & Stone, PC, wi Eighth Floor, West Tower, Washington DC			as Jefferson St., NW,
Telephone: 202/342-0800 Fax Number: 202/342-0807.			
3. Applicant has been retained personally or CMC Steel – South Carolina to provide legal case now pending before the above named contains the contains and the case of the cas	l repres	entation in conne	ction with the above
4. Since October 4 <sup>th</sup> of 1993, applicant has b standing of the bar of the highest court of the where ap certificate of good standing.	Distric	t of Columbia or	nember in good the State of es law. Attached is a
5. Applicant has been admitted to practice be following courts applicant has been admitted Courts; United States Circuit Courts of Appeand courts of other states or the District of C	to praceals; the	tice before: Unite Supreme Court o	ed States District

	Court:	Date Admitted:
•	Appellate Division of the Supreme	February 1, 1988
	Court of the State of New York First	
	Judicial Department	
•	Supreme Court of California	June 6, 1989
•	United States Court of Appeals for the	June 22, 1989
	Ninth Circuit	
•	United States Court of Appeals for the	May 24, 1990
	Federal Circuit	
•	United States Court of International	February 7, 1991
	Trade	
•	District of Columbia Court of Appeals	October 4, 1993

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Not Applicable (California bar membership is inactive at Applicant's election.)

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

Not Applicable

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

Not Applicable

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

Not Applicable

9. Local counsel of record associated with applicant in this case is <u>Debra Sherman</u> Tedeschi of The Tedeschi Law Firm, P.A., 1422 Laurel Street, Columbia, SC 29201.

If applicable list all other firms/attorneys you are associated with in this matter

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

Applicant filed an application to appear *pro hac vice* in the following proceeding before the Public Service Commission:

Name:

Case No. 2006-2-E

South Carolina Electric & Gas Company Annual Review of Base Rates for Fuel Costs

Status:

Settlement approved by Commission

Application:

January 12, 2006 and granted by Commission Order

Local Counsel: E. Wa

E. Wade Mullins, III

Name:

Case No. 2007-229-E

Application of South Carolina Electric & Gas Company for Adjustments and Increases in the Company's Electric Rate

Schedules and Tariffs

Status:

Settlement approved by Commission

Application:

June 15, 2007 and granted by Commission Order

Local Counsel:

E. Wade Mullins, III

Name:

Case No. 2008-196-E

Combined Application of South Carolina Electric & Gas Company

for a Certificate of Environmental Compatibility and Public

Convenience and Necessity and for a Base Load Review Order for

the Construction and Operation of a Nuclear Facility at

Jenkinsville, South Carolina

Status:

Commission Final Order issued February 27, 2009 July 14, 2008 and granted by Commission Order

Application: Local Counsel:

E. Wade Mullins, III

Name:

Case No. 2008-302-E

South Carolina Electric & Gas Company Annual Review of Base Rates for Fuel Costs

Status:

Settlement approved by Commission

Application:

September 2, 2008 and granted by Commission Order

Local Counsel:

E. Wade Mullins, III

Name:

Case No. 2009-2-E

South Carolina Electric & Gas Company

Annual Review of Base Rates for Fuel Costs

Status:

Settlement approved by Commission

Application:

March 16, 2009 and granted by Commission Order

Local Counsel:

E. Wade Mullins, III

Name:

Case No. 2009-261-E

South Carolina Electric & Gas Company's Request for Approval of Demand Side Management Plan Including a Demand Side Management Rate Rider and Portfolio of Energy Efficiency

**Programs** 

Status:

Settlement approved by Commission Order July 15, 2010 September 11, 2009 and granted by Commission Order

Application: Local Counsel:

E. Wade Mullins, III

Name:

Case No. 2009-489-E

Application of South Carolina Electric & gas Company for

Increases and Adjustments in Electric Rate Schedules and Tariffs

Status:

Commission Final Order issued July 15, 2010

Application:

March 19, 2010 and granted by Commission Order

Local Counsel:

E. Wade Mullins, III

- 11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.
- 12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 1st day of February, 2011.

APPLICANT

#### VERIFICATION

)

#### District of Columbia

I, Damon Xenopoulos, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

APPLICANT/AFFIANT

Notary Public for the State of DISTRICT OF COLUMB HA

My Commission Expires: JUNE 30, 2014

PAMELA D. INGRAM

Notary Public, District of Colorada

My Commission Expires June 30, 2014

#### LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 3 day of Feb., 2011.

LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE							
I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court via hand delivery to the South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this day of, 2011.							
Deber Jedisch.							



# Aistrict of Columbia Court of Appeals Committee on Admissions 430 K Street, N.W. — Room 123 Mashington, A. C. 20001 202/879-2710

I, JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals, do hereby certify that

		···	·,·····	DA	MON I	E. X	ENO	POULOS	5				
was	on the		1 <sup>TH</sup> (	day of			ос	TOBER	, 199	3			······
duly	quali	fied	and	admi	tted	as	an	atto	rney	and	coun	selor	and
enti	tled t	o pr	acti	ce be	fore	th	is	Court	and	is,	on	the	date
indi	cated b	elow,	an	activ	e mer	mber	in	good	stand	ding	of th	nis Ba	ır.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on January 18, 2011.

JULIO A. CASTILLO Clerk of the Court

By:

Deputy Clerk

### BEFORE THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION

#### Docket No. 2010-376-E

Petition of South Carolina Electric & Gas	)	
Company for Updates and Revisions to	)	
Schedules Related to the Construction of a	)	CERTIFICATE OF SERVICE
Nuclear Base Load Generation Facility at	)	
Jenkinsville, South Carolina	)	

This is to certify that I have caused to be served this—\(\frac{3}{2}\) day of February, 2011 a copy of the Motion of CMC Steel South Carolina for Admission Pro Hac Vice via first-class mail, postage pre-paid, to the persons named below at the addresses set forth below:

Belton T. Zeigler Lee Dixon Pope Zeigler, LLC P.O. Box 11509 Columbia, SC 29211 Jeffrey M. Nelson Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

K. Chad Burgess South Carolina Electric & Gas Company MC C222 220 Operation Way Cayce, SC 29033-3701 Scott Elliott
Elliott & Elliott, P.A.
1508 Lady Street
Columbia SC 29201

Mitchell M. Willoughby Willoughby & Hoefer, P.A. P.O. Box 8416 Columbia, SC 29202-8416

Debra Sherman Tedeschi

THE TEDESCHI LAW FIRM, P.A.

1422 Laurel Street Columbia, SC 29201